

SEP 03 2020

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

**SUPPRESSED**

UNITED STATES OF AMERICA,

Plaintiff,

V.

JOSHUA BROWN,

Defendant.

No.

**4:20CR00471 RWS/SRW**

**INDICTMENT**

**COUNT I**

The Grand Jury charges that:

At all times pertinent to the charges in this Indictment:

1. Federal law defined the term:

- (a) “minor” to mean any person under the age of eighteen years (18 U.S.C. § 2256(a));
- (b) “sexually explicit conduct” to mean actual or simulated
  - (i) sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex,
  - (ii) bestiality,
  - (iii) masturbation,
  - (iv) sadistic or masochistic abuse, or
  - (v) lascivious exhibition of the anus, genitals or pubic area of any person(18 U.S.C. § 2256(2)(A)); and

(c) "computer" to mean an electronic, magnetic, optical, electrochemical or other high speed data processing device performing logical, arithmetic or storage functions, including any data storage facility or communications facility directly related to or operating in conjunction with such device. (18 U.S.C. § 2256(6)).

2. The "Internet" was, and is, a computer communications network using interstate and foreign lines to transmit data streams, including data streams used to store, transfer and receive graphic files.

3. Between on or about March 3, 2020 and March 17, 2020, within the Eastern District of Missouri and elsewhere,

**JOSHUA L. BROWN,**

the defendant herein, did use any facility and means of interstate commerce, and did knowingly attempt to persuade, induce, entice and coerce a minor under the age of eighteen, to engage in sexual activity for which any person could be charged with a criminal offense, to wit: the defendant, who was at least twenty-one years of age, communicated via the internet with a twelve-year old child, and attempted to persuade, induce, entice and coerce such child, who the defendant knew was a minor under the age of eighteen, to engage in sexual activity, in violation of Missouri Revised Statutes Sections 566.032 (statutory rape in the first degree), 566.062 (statutory sodomy in the first degree), 566.068 (child molestation in the second degree) and 566.083 (sexual misconduct involving a child), in violation of Title 18, United States Code, Section 2422(b).

**COUNT II**

The Grand Jury further charges that:

1. The allegations contained in paragraphs one and two of Count I of this Indictment are incorporated by reference as if fully set forth herein.

2. Between on or about March 3, 2020 and March 17, 2020, within the Eastern District of Missouri and elsewhere,

**JOSHUA L. BROWN,**

the defendant herein, being required by Federal and other law to register as a sex offender, did commit a felony offense involving a minor under Title 18, United States Code, Section 2422(b), to wit: the felony offenses alleged in Count I of this Indictment; in violation of Title 18, United States Code, Section 2260A.

A TRUE BILL.

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FOREPERSON

JEFFREY B JENSEN  
United States Attorney

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